

United States District Court
District of Massachusetts

Steven R Drury plaintiff)

CA .No .03 -11422-MLW


)
The New England Regional Council Of) Emergency
Carpenters Carpenters local 107 Thomas Harrington ,) Motion to Remand
Art Sisco , Simon James and Kennedy & Rossi Inc) State court and
jurisdiction

Now Comes the plaintiff Steven R Drury in propria persona to Demand the court to remand this case back to state jurisdiction and to refuse the petition by the defendants respectfully due to the following reasons

- 1 The Defendants use Notice of Removal file 7 /30/03 to stop the plaintiffs on going hearing in state court on a preliminary injunction to heard on 08 /01/03
- 2 The Plaintiff never received notice of appearance form any of the lawyers AND does not wave his jurisdiction rights under law
- nor was any notices of appearance file with the state court or federal
- 3 The plaintiff states for the record that there is a state agreement which provides for the jurisdiction of the state court which the plaintiff is signatory as a member of the union
- 4 due to no filed appearances on record at the time the plaintiff objects to any and all motions filed
- 5 The plaintiff cause summons and notice to be served to all defendants whom received such 07/28 , and 07/29 / 03 who disregard such and cancel the schedule preliminary injunction hearing in state court using the notice of removal to wit cancel such hearing while the defendants play golf and took the day off given by one of the defendants Tom Harrington
- 6 the plaintiff could not respond due to there was no appearance filed nor could the plaintiff give tracking order for the superior court as it did not arrived
- 7 the plaintiff objects to the jurisdiction of the federal court because he can not see any federal jurisdiction over the subject matter or venue or himself
- 8 There s a schedule hearing on 08/25/03 on the matter of jurisdiction in the State superior court as the plaintiff file a objection motion 08/01 /03 day of the hearing for the injunction and the court has not remanded jurisdiction to the federal court as yet
- 9 The plaintiff objects to federal jurisdiction due to the fact that all signatory contractors operate and practice there business under and without federal jurisdiction and within the state of Massachusetts That the defendants hold a agreement under state jurisdiction which the plaintiff id a party to by membership in the brotherhood of carpenters

Proof of service

I Steven R Drury did fax and sent by US mail and cause a copy of this document to be sent to the defendants lawyers on 08/15/03 being to Aaron .D Krakow & Souris LLC , 225 friend Street , Boston , Ma , 02114 and Holland & Knight LLP 10 st james avenue Boston , ma . 02116 on this day 08/15 / of the year 2003



Steven R Drury

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**Commonwealth of Massachusetts
County of Worcester
The Superior Court**

CIVIL DOCKET# WOCV2003-01065

RE: **Drury v New England Regional Council of Carpenters et al**

TO: Steven Roland Drury
18 Drury Lane
Templeton, MA 01468

NOTICE TO APPEAR FOR MOTION HEARING

The Court will hear argument on the motion(s) referenced below

Motion/Hearing: miscellaneous

Motion to Deny the Removal of Defendants to Federal Court

Counsel should appear as follows:

DATE: 08/25/2003
TIME: 02:15 PM
LOCATION: Rm 18 (Session B)

Dated at Worcester, Massachusetts this 5th day of August, 2003.

Francis A. Ford,
Clerk of the Courts

BY:

Denise D. Foley
Assistant Clerk

Telephone: 508-770-1899, Ext. 129 or Ext. 108 (Session Clerk)

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TO: Steven Roland Drury
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Templeton, MA 01468

TRACKING ORDER - A TRACK

You are hereby notified that this case is on the track referenced above as per Superior Court Standing Order 1-88. The order requires that the various stages of litigation described below must be completed not later than the deadlines indicated.

STAGES OF LITIGATION

DEADLINE

Service of process made and return filed with the Court	08/28/2003
Response to the complaint filed (also see MRCP 12)	10/27/2003
All motions under MRCP 12, 19, and 20 filed	10/27/2003
All motions under MRCP 15 filed	08/22/2004
All discovery requests and depositions completed	07/18/2005
All motions under MRCP 56 filed and heard	09/16/2005
Final pre-trial conference held and/or firm trial date set	01/14/2006
Case disposed	05/29/2006

The final pre-trial deadline is not the scheduled date of the conference. You will be notified of that date at a later time.

Counsel for plaintiff must serve this tracking order on defendant before the deadline for filing return of service.

This case is assigned to session B sitting in Rm 18 (Session B) Worcester Superior Court.

Dated: 06/04/2003

BY:

Francis A. Ford,
Clerk of Courts

Denise D. Foley
Assistant Clerk

Location: Rm 18 (Session B)
Telephone: 508-770-1899, Ext. 129 or Ext. 108 (Session Clerk)